

Code of Ethics and Conduct

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Object of the document

This Code of Ethics and Conduct sets out the guidelines for ethical conduct and Enagás Renovable's firm commitment to comply with the highest international standards and best practices, as well as with all applicable laws, rules and regulations.

Changes from the previous version

N/A

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Message from the Director

Enagás Renovable is committed to conducting its business in the most sustainable and successful way for our customers, employees, partners and investors. Success is achieved through the right actions, acting with integrity.

To earn and maintain the trust of all our stakeholders, we must work to a consistently high set of ethical standards in all aspects of our work. Accordingly, we are committed to promoting ethical business practices and complying with all laws and regulations.

The purpose of this Code of Ethics and Conduct is to establish a framework for understanding and putting into practice the behaviour and expectations that Enagás Renovable places on each of us in our daily work.

We expect all Enagás Renovable employees to familiarise themselves with the Code of Ethics and Conduct, not only as a set of rules, but also as a tool to enable dialogue with our business partners and customers, to help us do the right thing every day. This Code is a guide in our daily work activities and facilitates decision-making in difficult situations.

Our values should inspire the decisions and actions we take to achieve our goals because they define who we are and how we do things.

Finally, we should all feel safe to seek advice or raise concerns. If you are ever concerned that our Code of Ethics and Conduct is not being followed, it is vital that you speak up and ask questions or share your concerns immediately. In accordance with this Code, any information we receive about questionable activities or possible violations will be treated with the highest level of confidentiality and retaliation of any kind against anyone who makes a report in good faith will not be tolerated.

Thank you for your continued dedication to Enagás Renovable and for your commitment to complying with the standards set out in this Code of Ethics and Conduct.



Antonio Martínez Rodríguez

Director General

1.Objective and Scope

This Code of Ethics and Conduct (hereinafter, the "Code") is mandatory and applies to all directors, administrators, officers and employees (collectively, the "Personnel") of Enagás Renovable S.A. and the subsidiaries under its control (collectively referred to as "Enagás Renovable" or the "Company"), to all business activities of Enagás Renovable, in each of the markets in which it operates, and to suppliers, agents, intermediaries, subcontractors or similar (hereinafter, collectively, "Third Parties") acting on behalf of the Company.

This Code establishes guidelines for ethical conduct and legal compliance at corporate level, as well as Enagás Renovable's firm commitment to comply with the highest international standards, norms and best practices in corporate governance, business ethics and strict compliance with all applicable laws, rules and regulations.

The Code is intended to help us recognise ethics and compliance issues before they arise and deal with them appropriately. It is not intended to be a compendium of policies or an exhaustive list of legal and compliance requirements.

As our Code cannot cover all the different applicable laws and regulations it is important to be familiar with any local regulations or legislation that apply where we work. In the first instance, we must comply with legal requirements. Complying with the law where we are should be the starting point. Where there is a difference between a legal requirement and our Code, always apply the stricter standard. In any event, breaches of the law must be avoided in all circumstances.

2.Values

Our Code includes the highest standards of integrity that we are committed to upholding in all aspects of our business. It is designed to help everyone at Enagás Renovable align our actions and decisions with our core values and compliance requirements:

- **Integrity:** We always do the right thing. We continually strive to achieve the highest standards of business conduct, safety and professionalism, even if this means making difficult decisions. We are firmly committed to complying with all laws and regulations, without compromise.
- **Value Creation:** We take a proactive approach to creating long-term value. We have a strong commitment to proactive and disciplined management of our operations to ensure efficiency and excellence in all our activities.
- **Sustainability:** We develop assets in a sustainable manner. We follow principles and policies that analyse, evaluate and propose measures to minimise the environmental impact of our business activities.

- **Diversity and teamwork:** We strive to create a safe, flexible, diverse and inclusive work environment. Respect and teamwork are key to achieving our goals. We treat others as we would like to be treated ourselves and put the team ahead of personal success.

3.About this Code

3.1. Commitment to Integrity

Regardless of their position in the organisation, their function or the territory in which they carry out their activities, it is the responsibility and obligation of all Personnel to know and uphold the values that inspire the rules of conduct set out in this Code, and to comply with them, as well as with the professional standards and rules for the prevention of crimes contained and developed in the Enagás Renewable Compliance policies (hereinafter also, the "Compliance Policies"), which are available on the Company's Intranet and website when carrying out their functions.

At the start of any professional relationship with Enagás Renewable, all Personnel shall receive a copy of the Code and the Company's Compliance Policies and must sign their adherence to them. Likewise, all Personnel shall receive regular training to ensure that they are aware of the Code and Compliance Policies and ensure that they comply with them correctly.

In summary, compliance with this Code and the Compliance Policies is a condition of employment at Enagás Renewable, and failure to comply with them may result in disciplinary action by the Company, up to and including termination of the professional relationship.

3.2. Without exception

No one has the authority to order or approve any act or omission that is contrary to this Code or against the law. This Code and its standards will never be compromised for any reason.

4. Personal and Business Integrity

4.1. Regulatory Compliance

All Personnel must strictly comply with all applicable laws, reject any type of illegal or fraudulent practice, and immediately inform the Compliance Officer through the Ethical Channel of any possible breach of applicable internal or external regulations.

4.2. Bribery and Corruption

At Enagás Renovable we base our relationships with suppliers, customers, agents, intermediaries, subcontractors or similar on the fundamental principles of fairness, honesty and mutual respect. We only do business with Third Parties that have high standards of conduct. We comply with all laws and regulations prohibiting bribery and corruption, and we do our utmost to try to ensure that our Third Parties do the same.

For this reason, Enagás Renovable does not tolerate and does not participate in commercial or business relationships involving bribery or corruption of any kind, whether in the private or public sector.

Similarly, Enagás Renovable expressly prohibits all types of facilitation payments or payments made to public officials for the purpose of streamlining or speeding up bureaucratic procedures that a company is entitled to carry out and that public officials may not refuse at their discretion.

To avoid corrupt practices when interacting with Third Parties, all Personnel must comply with all our internal regulations and specific Enagás Renovable policies.

4.3. Conflicts of Interest

All Personnel must maintain and guarantee an impartial stance in the performance of their duties and responsibilities and in decision-making at Enagás Renovable. Personnel must therefore avoid any situation in which their personal, financial or other interests are or could be perceived as being at odds with the interests of the Company.

In the event of a potential conflict of interest arising, the Personnel must notify the Compliance Officer as soon as they become aware of it and, in all circumstances, the interests of Enagás Renovable must always take precedence in the decision-making process.

The different types of conflicts of interest, as well as the way in which they should be communicated and the actions to be taken, are governed by Enagás Renovable's internal regulations or specific policy.

4.4. Confidential Information

Private, non-public information owned or possessed by Enagás Renewable is a valuable asset of the Company and is considered confidential. Therefore, all Personnel must manage all information and records with due care and maintain the strictest confidentiality with respect to the information to which they have access in the performance of their professional activities. In particular, they must maintain the confidentiality of all information relating to data, reports, accounts, balance sheets, industrial or financial information, strategic plans and other Company activities, and only access it within the Enagás Renewable e-mail system or other systems provided by the Company.

4.5. Privacy and Personal Data Protection

Enagás Renewable guarantees the right to privacy and personal data protection for all individuals who establish relations with Enagás Renewable, ensuring respect for their fundamental right to honour and personal privacy.

For this reason, Enagás Renewable promotes and protects the privacy of all Company Personnel and business partners by adopting the necessary security measures to prevent unauthorised use and ensuring compliance at all times with applicable laws and regulations.

4.6. Antitrust

Enagás Renewable undertakes to comply with the rules and principles of free competition in all markets in which it operates, applying principles of full competition and avoiding any distortion that prevents effective competition in the markets. Accordingly, all Personnel must avoid any practice or conduct whose aim or effect is, in any way, to restrict or distort competition.

4.7. Money Laundering and Financing of Terrorism

Enagás Renewable is firmly committed to complying with all applicable national and international laws for the prevention of the use of its business operations for any activity that facilitates money laundering, the financing of terrorism or any other criminal activity. In this regard, all Personnel must refrain from engaging in illicit practices in their dealings with Third Parties, including those related to money laundering and the financing of terrorism.

4.8. Financial Integrity

Enagás Renewable manages its financial resources responsibly, keeping reliable, accurate and complete financial and commercial records. Under no circumstances is it permitted to communicate inaccurate or misleading financial information to Third Parties. Personnel

entering into financial contracts or commitments with Third Parties must have the appropriate authorisation in accordance with the Company's authorisation matrix.

4.9. Asset Protection

Enagás Renovable's facilities and offices have a wide range of equipment. All equipment must be used in the context of the Company's professional activity.

We are all responsible for safeguarding and making proper use of the assets entrusted to us. This Code covers the protection of all Enagás Renovable assets, including physical assets, intellectual property assets and financial assets.

4.10. Good tax practices

Enagás Renovable is committed to complying with all its tax obligations in all jurisdictions in which it carries out its activities. All Personnel who perform functions or have responsibilities in this area must act in accordance with applicable tax legislation, as well as with relevant internal regulations or specific policies.

We pay particular attention to suspicious payments from third parties, such as payments by bearer cheques, payments in currencies other than those agreed, payments from persons or entities resident in tax havens, payments from entities where it is not possible to identify the parties or the beneficial owners, among others.

4.11. International Trade Sanctions

Enagás Renovable undertakes to ensure compliance with the international sanctions regimes for Third Parties established by the relevant national and international institutions in all the markets in which it operates.

5. Human and labor rights

Enagás Renewable is committed to protecting human rights in all our own operations. Everyone at Enagás Renewable must respect the personal dignity, privacy and personal rights of all others. No form of discrimination based on any personal characteristic (ethnicity, religion, gender, sexual identity, race, etc.) is tolerated.

5.1. Dignity and Respect. Equality and Diversity.

All of us must be treated with dignity, and with respect. Likewise, we must treat all our Third Parties in the same way. In this regard:

- **Prohibition of harassment and discrimination:** No employee may be subjected to harassment or bullying, whether physical, psychological, or any other form of sexual or non-sexual assault or abuse. We respect each other's differences and value what makes each of us unique.
- **Equal opportunities:** Enagás Renewable offers equal opportunities to all employees by promoting equal employment. Discrimination in employment is not permitted, including in hiring, remuneration, promotion, disciplinary measures or retirement. Any discrimination based on national origin, ethnicity, religion, caste, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health status, disability, pregnancy, smoking habits, or any other circumstance protected by law, is prohibited by this Code.

5.2. Health and Safety

Enagás Renewable's commitment to Health and Safety at all levels of the organisation is absolute. It is essential to protect the integrity and health of all our Personnel and Third Parties operating at any Enagás Renewable asset.

Enagás Renewable implements all necessary measures to promote health and safety at all its work centres, as well as robust mechanisms for efficient management of corporate and business risk control, in order to prevent workplace accidents from occurring.

6.Sustainability and Environment

At Enagás Renovable we are committed to conserving and protecting the environment, carrying out our activities in a respectful and sustainable manner, and minimising the environmental impact of our facilities and operations. The Company strives to ensure the efficient and responsible use of all resources present in our business activities, in order to safeguard the resources of future generations.

7.Relations with Third Parties

7.1. Due Diligence

Where necessary and appropriate, Enagás Renovable will ask our Third Parties to review and comply with the relevant Code and Compliance Policies, in addition to the laws and regulations in force at any given time. The Company performs a risk assessment of the Third Parties with which it intends to establish business relationships, in order to detect risks associated with the contractual relationship at an early stage and mitigate them appropriately.

7.2. Governments and Authorities

All business dealings with public authorities and administrations, government agencies and their representatives must be conducted with transparency, honesty and respect. Enagás Renovable maintains a neutral position with regard to political orientation and does not and will not directly or indirectly finance any political party or its representatives or candidates.

7.3. Communications and Social Media

Enagás Renovable promotes secure and responsible communication with the Third Parties with whom we are connected, in order to protect the Company's image and reputation.

In this context, the broadcasting or publication of opinions in the media or on social networks and the exchange of information in the private sphere on behalf of Enagás Renovable are strictly prohibited, as is the use of offensive language and discussing the trademarks or projects of Enagás Renovable or Third Parties.

Furthermore, the creation of corporate pages or accounts on social networks is the sole responsibility of Enagás Renovable, and no member of personnel or any Third Party should create, use or disseminate them unless authorised to do so. All personnel must exercise caution when interacting on social networks, must not divulge confidential information and

must ensure at all times that any personal opinions are presented as such and are never expressed on behalf of Enagás Renovable.

8. Ethical Channel

Enagás Renovable has set up an Ethical Channel, available in all its corporate languages (English and Spanish), on its Intranet and website, so that all Personnel and Third Parties can access it and report any actual or suspected unlawful or unethical behaviour, as well as breaches of the Code, Compliance Policies, laws or any other internal regulations or specific Company policy.

All Enagás Renovable employees are obliged to immediately report any known or suspected unethical conduct or breaches of the Code, Compliance Policies or regulations applicable to the Company. Failure to comply with this reporting obligation could result in disciplinary action or sanctions by the Company.

The ways to access the Ethical Channel are as follows:

- From the Enagás Renovable website.
- E-mail: canaletico@enagasrenovable.es

8.1. Communications Management

The Compliance Officer is the Enagás Renovable body responsible for receiving, responding to and, as appropriate, managing all communications sent through the Ethical Channel. Enagás Renovable undertakes to ensure that the organisation develops a system for the prompt, competent and confidential review and resolution of complaints involving a possible breach of the Code, Compliance Policies, laws or any other internal regulations or specific policies applicable to the Company.

The principles governing our Ethical Channel are as follows:

- **Secure and Confidential:** The Ethical Channel guarantees security and confidentiality to all reporting users and all persons under investigation. In addition, Personnel and Third Parties may submit communications anonymously if they wish to do so. All information received through the Ethical Channel will be fully and objectively investigated, regardless of whether it is received anonymously or not. However, you are welcome to provide contact details to facilitate the investigation, provide further information or relevant evidence. We guarantee that your identity will be kept confidential.
- **Good faith and Non-retaliation:** No retaliation or action will be taken against any member of Personnel or Third Party who has made a report based on a reasonable good faith belief that a member of personnel or any of our Third Parties has engaged

in unethical conduct or has breached the Code, Compliance Policies, the Law or any other internal regulation or specific Enagás Renovable policy. Enagás Renovable reserves the right to take disciplinary action against any person who knowingly provides false information or makes false accusations.

The process for determining whether a possible breach has occurred shall be carried out promptly and confidentially, taking into account the presumption of innocence. This process is detailed and developed in the Enagás Renovable Ethical Channel Management and Investigations Policy.

If a breach of our Code or any other regulations applicable to Enagás Renovable is proven, the Company will take appropriate disciplinary action, potentially including termination of employment, in accordance with applicable legislation.

8.2. Other communication channels

Enagás Renovable has made several communication channels available to receive any queries, concerns or complaints from Personnel:

- **Compliance Officer:** If you have any doubts about any policy, procedure or their application, you can contact the Compliance Officer directly. To get in touch, you can use the following e-mail address: eticaycompliance@enagasrenovable.es
- **Line manager:** You can always go to your line manager with any questions or concerns. Personnel may feel more comfortable communicating their concerns informally and have the option to discuss their concerns with the person they report to.

9. Disciplinary Regime

Enagás Renovable will take disciplinary action against Personnel involved in any breach of the Code, Compliance Policies or laws in a manner that is fair, consistent and reflects the nature and facts of the breach. Any disciplinary action, which may include dismissal, will be taken in strict compliance with applicable labour laws and regulations.

With respect to the involvement of Third Parties in any breach or infringement, Enagás Renovable shall take the appropriate measures with respect to the contractual relationship with them, taking into account the infringement detected, the contractual provisions and the law.